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Defendant Alexander Dy

HENRY PETERS AND PAMELA PETERS,	:	UNITED STATES DISTRICT
	:	COURT DISTRICT OF NEW JERSEY
	:	
Plaintiffs,	:	Case No. 07-CV-2210 (KSH-PS)
	:	
v.	:	CIVIL ACTION
ROLAND DAVID, NATIONAL	:	
COMMERCIAL BUSINESS CREDIT;	:	
R. DAVID & ASSOCIATES PA, LLC;	:	
FINANCIAL SERVICES GROUP, LLC;	:	
CREDIT MANAGEMENT & RECOVERY	:	
SERVICES, INC.; GOLDSTAR	:	
MORTGAGE; ALEXANDER DY; PNC	:	DEFENDANT ALEXANDER DY'S
BANK; CAROL ZAGORIC; JOANNE	:	NOTICE OF MOTION
RAGGI; FGC COMMERICAL MORTGAGE	:	FOR RECONSIDERATION
FINANCE; JOURNEYMAN TITLE	:	
AGENCY, INC.; CHICAGO TITLE	:	
INSURANCE COMPANY; LYNN	:	
LAZARO; JOHN DOE 1 through	:	
10; and XYZ INC., ten names	:	
being fictitious and unknown	:	
to the plaintiffs, the person	:	
or parties intended being	:	
the persons or parties, if	:	
any,	:	
Defendants.	:	

TO: Shmuel Klein, P.C.
113 Cedarhill Avenue
Mahwah, New Jersey 07430

PLEASE TAKE NOTICE that on September 7, 2010 at 9:00 a.m. or on a date and time set by the Court as soon thereafter as counsel may be heard, the undersigned, counsel for Defendant Alexander Dy, shall move before the Honorable Katharine S. Hayden, U.S.D.J., for the District Court of New Jersey, at the Martin Luther King, Jr. Federal Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, and shall move this Court for reconsideration and modification of the Opinion and Order of the Honorable Katherine S. Hayden, filed on July 29, 2010, pursuant to Local Rule 7.1, and such other relief as the court deems just and proper.

PLEASE TAKE FURTHER NOTICE that in support of the within motion, Movant Dy shall rely upon the accompanying brief, exhibits, and certifications, together with all the pleadings and papers filed in this action, and on whatever argument and evidence may be presented at the hearing. A proposed form of Order is annexed.

Any opposition to Dy's Motion for Reconsideration must be filed in accordance with the Federal Rules of Civil Procedure and Local Rule 7.1.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Respectfully submitted,

DEL CARMEN & MANGAL, P.C.
Attorney for Defendant
Alexander Dy

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Date: August 11, 2010